

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE: CENTURYLINK SALES
PRACTICES AND SECURITIES
LITIGATION

MDL No. 17-2795 (MJD/KMM)

This Document Relates to:
Civil File No. 18-296 (MJD/KMM)

JOINT MOTION REGARDING CONTINUED SEALING

Documents have been filed under temporary seal in connection with Plaintiffs' Motion for Class Certification and Appointment of Class Representatives and Class Counsel.

Document	MDL Docket	18-CV-296 Docket
Exhibit 5 to the Declaration of Ryan M. Blair in Support of Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion for Class Certification and Appointment of Class Representatives and Class Counsel ("Blair Decl.")	619	228
Exhibit 7 to Blair Decl.	619-1	228-1
Reply Memorandum of Law in Further Support of Plaintiffs' Motion for Class Certification	695	249
Declaration of Michael D. Blatchley in Further Support of Plaintiffs' Motion for Class Certification ("Blatchley Decl.")	697	251
Exhibit F to Blatchley Decl.	697-1	251-1
Exhibit U to Blatchley Decl.	697-2	251-2
Exhibit V to Blatchley Decl.	697-3	251-3

Document	MDL Docket	18-CV-296 Docket
Exhibit W to Blatchley Decl.	697-4	251-4

Pursuant to LR 5.6, the parties submit this Joint Motion Regarding Continued Sealing.

DKT. NO.	DKT. NO. OF REDACTED VERSION (IF FILED)	DESCRIPTION OF DOCUMENT	PRECISELY IDENTIFY: (a) the information that the parties agree should remain sealed; (b) the information that the parties agree should be unsealed; and (c) the information about which the parties disagree. L.R. 5.6(d)(2)(A)(ii).	REASON WHY DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED
619 (228 in Craig , No. 18-cv- 296)		Exhibit 5 to the Declaration of Ryan M. Blair in Support of Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion for Class Certification and Appointment of Class Representatives and Class Counsel	<i>Plaintiffs' position:</i> Entire document should be unsealed. <i>Defendants' position:</i> Defendants do not oppose unsealing this document.	<i>Plaintiffs' position:</i> Document does not contain trade secrets or other confidential or proprietary information. <i>Defendants' position:</i> Document does not contain Defendants' trade secrets or other confidential or proprietary information of Defendants.
619-1 (228-1 in Craig , No. 18-cv- 296)		Exhibit 7 to the Declaration of Ryan M. Blair in Support of Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion for Class Certification and Appointment of Class Representatives and Class Counsel	<i>Plaintiffs' position:</i> Entire document should be unsealed. <i>Defendants' position:</i> Defendants do not oppose unsealing this document.	<i>Plaintiffs' position:</i> Document does not contain trade secrets or other confidential or proprietary information. <i>Defendants' position:</i> Document does not contain Defendants' trade secrets or other confidential or proprietary information of Defendants.

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695 (249 in Craig , No. 18-cv- 296)	700 (254 in Craig , No. 18-cv- 296)	Reply Memorandum of Law in Further Support of Plaintiffs' Motion for Class Certification	<i>Plaintiffs' position:</i> Pages 7-9 and 16 should be unsealed. <i>Defendants' position:</i> Defendants do not oppose unsealing this document.	<i>Plaintiffs' position:</i> Document does not contain trade secrets or other confidential or proprietary information. <i>Defendants' position:</i> Document contains trade secrets or other confidential or proprietary information, reveals information that is not commonly known to the public and derives actual and potential value from not being generally known to the public, and contains information designated as "Confidential" under a protective order issued in this case [Dkt. No. 464]. However, Defendants do not oppose unsealing.
697 (251 in Craig , No. 18-cv- 296)	698 (252 in Craig , No. 18-cv- 296)	Declaration of Michael D. Blatchley in Further Support of Plaintiffs' Motion for Class Certification	<i>Plaintiffs' position:</i> Paragraph 7 should be unsealed. <i>Defendants' position:</i> Defendants do not oppose unsealing this document.	<i>Plaintiffs' position:</i> Document does not contain trade secrets or other confidential or proprietary information. <i>Defendants' position:</i> Document contains trade secrets or other confidential or proprietary information, reveals information that is not commonly known to the public and derives actual and potential value from not being generally known to the public, and contains information designated as "Confidential" under a protective order issued in this case [Dkt. No. 464]. However, Defendants do not oppose unsealing.

DKT. NO.	DKT. NO. OF REDACTED VERSION (IF FILED)	DESCRIPTION OF DOCUMENT	PRECISELY IDENTIFY: (a) the information that the parties agree should remain sealed; (b) the information that the parties agree should be unsealed; and (c) the information about which the parties disagree. L.R. 5.6(d)(2)(A)(ii).	REASON WHY DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED
697-1 (251-1 in <i>Craig</i> , No. 18-cv-296)	698-1 (252-1 in <i>Craig</i> , No. 18-cv-296)	Exhibit F to the Declaration of Michael D. Blatchley in Further Support of Plaintiffs' Motion for Class Certification	Plaintiffs' position: Pages 17, 20-21, 33, 35, and 38-39 should be unsealed. Defendants' position: Defendants do not oppose unsealing this document.	Plaintiffs' position: Document does not contain trade secrets or other confidential or proprietary information. Defendants' position: Document contains trade secrets or other confidential or proprietary information, reveals information that is not commonly known to the public and derives actual and potential value from not being generally known to the public, and contains information designated as "Confidential" under a protective order issued in this case [Dkt. No. 464]. However, Defendants do not oppose unsealing.
697-2 (251-2 in <i>Craig</i> , No. 18-cv-296)		Exhibit U to the Declaration of Michael D. Blatchley in Further Support of Plaintiffs' Motion for Class Certification	Plaintiffs' position: Entire document (CTLMNSEC00015392-15396) should be unsealed. Defendants' position: Defendants do not oppose unsealing this document.	Plaintiffs' position: Document does not contain trade secrets or other confidential or proprietary information. Defendants' position: Document contains trade secrets or other confidential or proprietary information, reveals information that is not commonly known to the public and derives actual and potential value from not being generally known to the public, and contains information designated as "Highly Confidential – Attorney's Eyes Only" under a protective order issued in this case [Dkt. No. 464] and "Confidential" pursuant to the November 28, 2017 protective order in <i>State of Minnesota v. CenturyTel Broadband Services LLC et al.</i> However, Defendants do not oppose unsealing.

DKT. NO.	DKT. NO. OF REDACTED VERSION (IF FILED)	DESCRIPTION OF DOCUMENT	PRECISELY IDENTIFY: (a) the information that the parties agree should remain sealed; (b) the information that the parties agree should be unsealed; and (c) the information about which the parties disagree. L.R. 5.6(d)(2)(A)(ii).	REASON WHY DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED
697-3 (251-3 in <i>Craig</i> , No. 18-cv-296)		Exhibit V to the Declaration of Michael D. Blatchley in Further Support of Plaintiffs' Motion for Class Certification	<i>Plaintiffs' position:</i> Entire document (CTLMNSEC00015386-15391) should be unsealed. <i>Defendants' position:</i> Defendants do not oppose unsealing this document.	<i>Plaintiffs' position:</i> Document does not contain trade secrets or other confidential or proprietary information. <i>Defendants' position:</i> Document contains trade secrets or other confidential or proprietary information, reveals information that is not commonly known to the public and derives actual and potential value from not being generally known to the public, and contains information designated as "Highly Confidential – Attorney's Eyes Only" under a protective order issued in this case [Dkt. No. 464] and "Confidential" pursuant to the November 28, 2017 protective order in <i>State of Minnesota v. CenturyTel Broadband Services LLC et al.</i> However, Defendants do not oppose unsealing.
697-4 (251-4 in <i>Craig</i> , No. 18-cv-296)		Exhibit W to the Declaration of Michael D. Blatchley in Further Support of Plaintiffs' Motion for Class Certification	<i>Plaintiffs' position:</i> Entire document (CTLMNSEC00913462-913480) should be unsealed. <i>Defendants' position:</i> Defendants do not oppose unsealing this document.	<i>Plaintiffs' position:</i> Document does not contain trade secrets or other confidential or proprietary information. <i>Defendants' position:</i> Document contains trade secrets or other confidential or proprietary information, reveals information that is not commonly known to the public and derives actual and potential value from not being generally known to the public, and contains information designated as "Confidential" under a protective order issued in this case [Dkt. No. 464]. However, Defendants do not oppose unsealing.

DATED: July 17, 2020

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